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January 23, 2018

**VIA ECF**

Hon. John G. Koeltl  
United States District Court  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: Jane Doe 43 v. Jeffrey Epstein, et al.  
Civil Action No. 17-cv-616**

Dear Judge Koeltl:

We represent Defendants Jeffrey Epstein and Lesley Groff ("Defendants") in the above-referenced matter and write to request permission to file a 30-page brief in support of Defendants' supplemental motion to dismiss.

The brief that Defendants plan to submit will provide grounds for dismissal that are applicable not only to Defendants, but also to defendant Sarah Kellen ("Kellen"). We understand that Kellen plans to adopt certain of the arguments to be set forth in Defendants' brief, instead of repeating them in her brief. We further understand that Kellen will separately file a brief, but primarily to set forth additional grounds for dismissal that are applicable to her. We expect that the total pages of the two briefs will be under 50.

The Court entered the Confidentiality Stipulation and Order ("Confidentiality Order") on January 19, 2018 (ECF # 100). In accordance with the Court's order dated November 22, 2017 (ECF # 85) providing for seven (7) days from the entry of the Confidentiality Order to file the supplemental motions to dismiss, Defendants will file their motion on January 26, 2018.

Defendants therefore respectfully request permission to file a 30-page brief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael C. Miller".

Michael C. Miller  
*Counsel for Defendants Jeffrey  
Epstein and Lesley Groff*